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*Proposed Co-Counsel to the Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re:	)	
	)	Chapter 11
NORDIC AVIATION CAPITAL DESIGNATED	)	
ACTIVITY COMPANY, <i>et al.</i> , <sup>1</sup>	)	Case No. 21-33693 (KRH)
	)	
Debtors.	)	(Joint Administration Requested)
	)	

**DEBTORS' MOTION FOR  
ENTRY OF AN ORDER (I) SETTING AN EXPEDITED  
HEARING ON "FIRST DAY MOTIONS," (II) APPROVING THE  
FORM OF COMMENCEMENT, AND (III) GRANTING RELATED RELIEF**

The above-captioned debtors and debtors in possession (collectively, the "Debtors") respectfully state as follows in support of this motion (the "Motion"):<sup>2</sup>

<sup>1</sup> Due to the large number of Debtors in these chapter 11 cases, for which joint administration has been requested, a complete list of the Debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list may be obtained on the website of the Debtors' proposed claims and noticing agent at <http://dm.epiq11.com/nac>. The location of the Debtors' service address for the purposes of these chapter 11 cases is: 550 Andrews Avenue, Suite 300, Fort Lauderdale, Florida 33301.

<sup>2</sup> The facts and circumstances supporting this Motion are set forth in the *Declaration of Justin Bickle, Chief Executive Officer of Nordic Aviation Capital A/S and Chairman of the Restructuring Committee, in Support of the Debtors' Chapter 11 Petitions and Restructuring Transactions* (the "Bickle Declaration") and the *Declaration of Briana Richards in Support of the Debtors' Chapter 11 Petitions and First Day Motions*

**Relief Requested**

1. The Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (respectfully, the “Order”): (a) setting an expedited hearing (the “First Day Hearing”) at the Court’s earliest convenience on the Debtors’ “first day” motions and applications (collectively, the “First Day Motions”) described on the proposed first day agenda set forth on Exhibit 1 annexed to the Order (the “Proposed First Day Agenda”); (b) deeming the *Debtors’ Notice of Filing of Chapter 11 Petitions and First Day Motions and of Proposed Hearing on First Day Motions* substantially in the form attached as Exhibit 2 to the Order (the “Notice of First Day Hearing”) to be adequate and appropriate notice under the circumstances; (c) approving the notice of commencement substantially in the form attached as Exhibit 3 to the Order (the “Notice of Commencement”); and (d) granting related relief.

2. On December 19, 2021 (the “Petition Date”), the Debtors filed the First Day Motions to be heard by this Court on an expedited basis. Prompt entry of the relief requested in the First Day Motions is critical to maintaining the Debtors’ ongoing operations and the value of their bankruptcy estates. Accordingly, by this Motion, the Debtors seek this Court’s entry of an order setting an expedited First Day Hearing at the Court’s earliest available time to consider the First Day Motions and deeming the Notice of First Day Hearing to be adequate and appropriate notice under the circumstances. The Debtors further request that the requirement of filing a written response to the First Day Motions is waived.

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(the “Richards Declaration,” together with the Bickle Declaration, the “First Day Declarations”), as applicable, each filed contemporaneously with this Motion and incorporated by reference herein. Capitalized terms used but not immediately defined have the meanings given to them elsewhere in this Motion or in the First Day Declarations, as applicable.

### **Jurisdiction and Venue**

3. The United States Bankruptcy Court for the Eastern District of Virginia (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference from the United States District Court for the Eastern District of Virginia*, dated August 15, 1984. The Debtors confirm their consent, pursuant to rule 7008 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

4. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The bases for the relief requested herein are sections 102(1) and 105(a) of the Bankruptcy Code, Bankruptcy Rules 2002, 9006, and 9007, and rules 1075-1, 5005-2 and 9013-1(M) and (N) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Bankruptcy Rules”).

### **Background**

6. Nordic Aviation Capital Designated Activity Company (“NAC DAC,” together with its Debtor and non-Debtor affiliates, the “Company” or the “Group”) is the world’s largest regional aircraft lessor and the sixth largest commercial aircraft lessor, offering leasing and lease management solutions to airlines and aircraft investors worldwide. Headquartered in Limerick, Ireland, the Company employs approximately 170 individuals in Europe, North America, and Asia. The Company serves approximately seventy-five customers across forty-five countries, with customers mainly consisting of third-party aircraft operators—many of whom are leading regional airlines in Europe, North America, Asia, and Africa. Investing in new, modern, and in-demand aircraft, the Company orders such aircraft directly from original equipment

manufacturers or acquires aircraft through sale and leaseback transactions or the portfolios of other lessors. The Company currently owns approximately 469 aircraft, comprised of 279 turboprops and 190 regional jets, and manages an additional six turboprops. With a strong position in the regional aircraft leasing landscape, the Company is positioned to thrive in the near-term by continuing to provide comprehensive fleet solutions to leading airlines as aviation-related demand rebounds.

7. On December 17, 2021, Nordic Aviation Capital Pte. Ltd. and three affiliated Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. On the Petition Date, Nordic Aviation Capital Designated Activity Company and the remaining above-captioned Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their business and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Concurrently with the filing of this Motion, the Debtors filed a motion requesting procedural consolidation and joint administration of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b). No request for the appointment of a trustee or examiner has been made in these chapter 11 cases, and no official committees have been appointed or designated.

### **Form of Commencement**

8. The Debtors have thousands of potential creditors who, along with other parties in interest in these chapter 11 cases, may file requests for service of filings pursuant to Bankruptcy Rule 2002 (the “2002 List”).<sup>3</sup> The Debtors also expect that numerous motions and applications will be filed in these chapter 11 cases in pursuit of various forms of relief.

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<sup>3</sup> Bankruptcy Rule 2002(i) provides, in pertinent part: “[T]he court may order that notices . . . be transmitted to the United States trustee and be mailed only to the committees elected under § 705 or appointed under § 1102 of the

9. Contemporaneously herewith, the Debtors have filed with the Court the *Debtors' Application for Entry of an Order Pursuant to 28 U.S.C. § 156(c) (I) Approving the Retention and Appointment of Epiq as Claims and Noticing Agent to the Debtors and (II) Granting Related Relief*, seeking approval to retain Epiq Corporate Restructuring, LLC (“Epiq”) as notice and claims agent. In connection with Epiq’s proposed retention, the Debtors seek authority to provide all required notices to parties in interest in these chapter 11 cases. More specifically, the Debtors propose that, among other things, Epiq will serve all notices required in these chapter 11 cases, including the notice of commencement of the chapter 11 cases and the meeting of creditors pursuant to section 341 of the Bankruptcy Code.

10. Accordingly, the Debtors propose that Epiq serve the Notice of Commencement, substantially in the form attached as Exhibit 3 to the Order. The Notice of Commencement will be (a) distributed to the Core Group (as defined by the Court’s *Procedures for the Complex Chapter 11 Cases in the Eastern District of Virginia* as adopted by Local Rule 1075-1) and the 2002 List and (b) available at all times on the case website, <http://dm.epiq11.com/nac>, maintained by Epiq.

### **Basis for Relief**

#### **I. The Court Should Set an Expedited Hearing on the First Day Motions.**

11. Local Bankruptcy Rules 1075-1 and 9013-1 contemplate and allow for the setting of a hearing on an expedited basis as requested herein. An expedited hearing on the First Day Motions is appropriate under these circumstances and is consistent with past practices in virtually

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Code or to their authorized agents and to the creditors and equity security holders who serve on the trustee or debtor in possession and file a request that all notices be mailed to them.”

every significant chapter 11 case, where various relief is required at the outset of the case to ensure a smooth transition into chapter 11.

12. Additionally, section 105(a) of the Bankruptcy Code provides this Court with the power to set an expedited First Day Hearing on the First Day Motions. Section 105(a) states that a bankruptcy court “may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].” 11 U.S.C. § 105(a).

13. The relief sought in the First Day Motions is essential to avoid substantial disruption to the normal operations of the Debtors’ business. Moreover, expedited consideration of first day motions was granted by this Court in several previous chapter 11 cases. *See, e.g., In re Le Tote, Inc.*, No. 20-33332 (KLP) (Bankr. E.D. Va. Aug. 3, 2020); *In re Ascena Retail Grp.*, No. 20-33113 (KRH) (Bankr. E.D. Va. July 24, 2020); *In re Intelsat S.A.*, No. 20-32299 (KLP) (Bankr. E.D. Va. May 15, 2020); *In re Chino Holdings, Inc.*, No. 20-32181 (KLP) (Bankr. E.D. Va. May 5, 2020); *In re Pier 1 Imports, Inc.*, No. 20-30805 (KRH) (Bankr. E.D. Va. Feb. 19, 2020).<sup>4</sup>

## **II. The Court Should Approve the Form of Commencement.**

14. Further, the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules provide the Debtors with the authority to establish notice and administrative procedures. In particular, Bankruptcy Rule 2002(a) provides that, unless otherwise ordered by the Court, notice of certain matters must be given to, among others, all of the Debtors’ creditors, equity security holders, and other parties in interest. Fed. R. Bankr. P. 2002(a). The Bankruptcy Rules further provide that “[t]he court may from time to time enter orders designating the matters in respect to which, the entity to whom, and the form and manner in which notices shall be sent except as

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<sup>4</sup> Because of the voluminous nature of the orders cited herein, such orders have not been attached to this Motion. Copies of these orders are available upon request of the Debtors’ proposed counsel.

otherwise provided by these rules.” Fed. R. Bankr. P. 2002(m); *see also* Fed. R. Bankr. P. 9007 (“When notice is to be given under these rules, the court shall designate, if not otherwise specified herein, the time within which, the entities to whom, and the form and manner in which the notice shall be given.”).

15. In addition, section 105(a) of the Bankruptcy Code grants bankruptcy courts broad authority and discretion to enforce the provisions of the Bankruptcy Code either under specific statutes or under equitable common law principles. Specifically, section 105(a) of the Bankruptcy Code provides:

The court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title. No provision of this title providing for the raising of an issue by a party in interest shall be construed to preclude the court from, *sua sponte*, taking any action or making any determination necessary or appropriate to enforce or implement court orders or rules, or to prevent an abuse of process.

11 U.S.C. § 105(a).

16. Section 102(1) of the Bankruptcy Code states that where the Bankruptcy Code provides for an action to occur “after notice and a hearing,” such action may occur “after such notice as is appropriate in the particular circumstances, and such opportunity for a hearing as is appropriate in the particular circumstances . . . .” 11 U.S.C. § 102(1)(A).

17. The Debtors respectfully submit that the Notice of Commencement will promote the efficient and orderly administration of these chapter 11 cases. Additionally, courts in this district have granted relief similar to that requested herein in previous chapter 11 cases. *See, e.g., In re Le Tote, Inc.*, No. 20-33332 (KLP) (Bankr. E.D. Va. Aug. 3, 2020) (same); *In re Ascena Retail Grp.*, No. 20-3313 (KRH) (Bankr. E.D. Va. July 24, 2020) (same); *In re Intelsat S.A.*, No. 20-32299 (KLP) (Bankr. E.D. Va. May 15, 2020) (same); *In re Pier 1 Imports, Inc.*, No. 20-30805

(KRH) (Bankr. E.D. Va. Feb. 24, 2020) (same); *In re Toys “R” Us, Inc.*, No. 17-34665 (KLP) (Bankr. E.D. Va. Sept. 21, 2017) (same).

18. Accordingly, for the reasons stated herein, the Debtors believe that expedited consideration of the First Day Motions is appropriate and that the Notice of Commencement should be approved and implemented in these chapter 11 cases.

**Waiver of Memorandum of Points and Authorities**

19. The Debtors respectfully request that this Court treat this Motion as a written memorandum of points and authorities or waive any requirement that this Motion be accompanied by a written memorandum of points and authorities as described in Local Bankruptcy Rule 9013-1(G).

**Notice**

20. The Debtors will provide notice of this Motion to the following parties or their respective counsel: (a) the United States Trustee for the Eastern District of Virginia, Attn: Elisabetta G. Gasparini, Kathryn Montgomery, Jason B. Shorter, and Nicholas S. Herron; (b) the holders of the thirty largest unsecured claims against the Debtors (on a consolidated basis); (c) the agent under each of the Debtors’ financing arrangements and counsel thereto; (d) Akin Gump Strauss Hauer & Feld LLP, as counsel to an ad hoc group of holders of the Debtors’ various U.S. private placement notes; (e) Milbank LLP, in its capacity as counsel to Silver Point Capital and its affiliates and related funds; (f) Linklaters LLP, as counsel to an ad hoc group of lenders under various of the Debtors’ secured credit facilities; (g) Weil, Gotshal & Manges LLP and McGuireWoods LLP, as co-counsel to an ad hoc group of lenders under various of the Debtors’ secured credit facilities; (h) Milbank LLP and Hunton Andrews Kurth LLP, in their capacities as co-counsel to an ad hoc group of lenders under various of the Debtors’ secured credit facilities; (i) Allen & Overy LLP, in its capacity as counsel to PFA Asset Management A/S;



(j) Freshfields Bruckhaus Deringer LLP, as counsel to certain of the Debtors' shareholders; (k) Allen & Overy LLP, in its capacity as counsel to certain export credit agency lenders; (l) the United States Attorney's Office for the Eastern District of Virginia; (m) the Internal Revenue Service; (n) the office of the attorneys general for the states in which the Debtors operate; (o) the National Association of Attorneys General; (p) the Securities and Exchange Commission; and (q) any party that has requested notice pursuant to Bankruptcy Rule 2002 (collectively, the "Notice Parties"). The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

**No Prior Request**

21. No prior request for the relief sought in this Motion has been made to this or any other court.

*[Remainder of page intentionally left blank]*

WHEREFORE, the Debtors respectfully request that the Court enter the Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Richmond, Virginia  
Dated: December 20, 2021

*/s/ Jeremy S. Williams*

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*Proposed Co-Counsel to the Debtors and Debtors in Possession*

**Certification**

In support of the *Debtors' Motion for Entry of an Order (I) Setting an Expedited Hearing on "First Day Motions," (II) Approving the Form of Commencement, and (III) Granting Related Relief* and as required by Rule 9013-1(N) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Eastern District of Virginia, the undersigned proposed counsel for the Debtors certifies as follows:

1. I am a member of the Bar of this Court.
2. I have carefully examined this matter and have concluded that there is a true need for an emergency hearing.
3. I have not created the emergency through the lack of diligence.
4. A *bona fide* effort to resolve the matters could not be made without a hearing.

/s/ Jeremy S. Williams

**Exhibit A**

**Proposed Order**

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Emily Geier (*pro hac vice* pending)  
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*Proposed Co-Counsel to the Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re:	)	
	)	Chapter 11
	)	
NORDIC AVIATION CAPITAL DESIGNATED	)	Case No. 21-33693 (KRH)
ACTIVITY COMPANY, <i>et al.</i> , <sup>1</sup>	)	
	)	
Debtors.	)	(Joint Administration Requested)
	)	

**ORDER (I) SETTING AN  
EXPEDITED HEARING ON “FIRST DAY MOTIONS,” (II) APPROVING  
THE FORM OF COMMENCEMENT, AND (III) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an order (this “Order”): (a) setting an expedited hearing at the Court’s earliest convenience on the Debtors’ First Day Motions, (b) deeming the Debtors’

<sup>1</sup> Due to the large number of Debtors in these chapter 11 cases, for which joint administration has been requested, a complete list of the Debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list may be obtained on the website of the Debtors’ proposed claims and noticing agent at <http://dm.epiq11.com/nac>. The location of the Debtors’ service address for the purposes of these chapter 11 cases is: 550 Andrews Avenue, Suite 300, Fort Lauderdale, Florida 33301.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

Notice of First Day Hearing to be adequate and appropriate notice under the circumstances, (c) approving the Notice of Commencement, and (d) granting related relief all as more fully set forth in the Motion; and upon the First Day Declarations; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference from the United States District Court for the Eastern District of Virginia*, dated August 15, 1984; and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and that no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth in this Order.
2. A hearing will be held on **December 21, 2021, at 9:00 a.m., prevailing Eastern Time** (the "First Day Hearing"), to hear and consider the "first day" motions and applications listed on the proposed agenda attached hereto as **Exhibit 1** (collectively, the "First Day Motions").

3. The form of the *Debtors' Notice of Filing of Chapter 11 Petitions and First Day Motions and of Proposed Hearing on First Day Motions* attached hereto as **Exhibit 2** (the "Notice of First Day Hearing") is approved.

4. As soon as practicable after the commencement of these chapter 11 cases, the Debtors shall serve notice of the Motion and the First Day Motions via hand, electronic mail, overnight delivery, or facsimile to the Notice Parties.

5. The form of notice of commencement of the chapter 11 cases attached hereto as **Exhibit 3** (the "Notice of Commencement") is hereby approved. Such notice shall be served on all known creditors by Epiq by first class U.S. mail, postage prepaid, no later than five (5) business days after the date of entry of this Order.

6. The requirement under Local Bankruptcy Rule 9013-1(G) to file a memorandum of law in connection with the Motion is waived.

7. The notice requirements of Local Bankruptcy Rule 9013-1(M) are hereby waived for the Motion and the First Day Motions, subject to the Court's right, upon further consideration at the First Day Hearing, to require additional notice with respect to any particular First Day Motion.

8. Subject to the Debtors serving the First Day Motions in accordance with this Order, the requirements of Local Bankruptcy Rule 9022-1(B) are hereby waived for the Motion and the First Day Motions.

9. The requirement of filing a written response to the First Day Motions is waived.

10. The endorsement requirement of Local Bankruptcy Rule 9022-1(C) is hereby waived for the purposes of this Order.

11. A copy of this Order shall be separately docketed in each of the Debtors' chapter 11 cases.

12. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

13. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

14. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: \_\_\_\_\_  
Richmond, Virginia

\_\_\_\_\_  
United States Bankruptcy Judge



WE ASK FOR THIS:

/s/ Jeremy S. Williams

Michael A. Condyles (VA 27807)

Peter J. Barrett (VA 46179)

Jeremy S. Williams (VA 77469)

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*Proposed Co-Counsel to the Debtors and Debtors in Possession*

**CERTIFICATION OF ENDORSEMENT**  
**UNDER LOCAL BANKRUPTCY RULE 9022-1(C)**

Pursuant to Local Bankruptcy Rule 9022-1(C), I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Jeremy S. Williams

**Exhibit 1**

**First Day Agenda**

Edward O. Sassower, P.C. (*pro hac vice* pending)  
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*Proposed Co-Counsel to the Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

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In re:	)	
	)	Chapter 11
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NORDIC AVIATION CAPITAL DESIGNATED	)	Case No. 21-33693 (KRH)
ACTIVITY COMPANY, <i>et al.</i> , <sup>1</sup>	)	
	)	
Debtors.	)	(Joint Administration Requested)
	)	

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**FIRST DAY AGENDA FOR HEARING ON  
DECEMBER 21, 2021, AT 9:00 A.M. (PREVAILING EASTERN TIME)**

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**PLEASE TAKE NOTICE** that the following matters are scheduled for hearing by remote video conference on December 21, 2021 at 9:00 a.m. (prevailing Eastern Time). Interested parties who wish to participate by video or audio may do so by registering in advance at:

<https://www.zoomgov.com/meeting/register/vJItcuytqzopGgMutCBACQQK3wK5bcKa-Jc>

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<sup>1</sup> Due to the large number of Debtors in these chapter 11 cases, for which joint administration has been requested, a complete list of the Debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list may be obtained on the website of the Debtors' proposed claims and noticing agent at <http://dm.epiq11.com/nac>. The location of the Debtors' service address for the purposes of these chapter 11 cases is: 550 Andrews Avenue, Suite 300, Fort Lauderdale, Florida 33301.

## I. INTRODUCTION

1. “Joint Administration Motion” Debtors’ Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief [Docket No. 3].
2. “First Day Bickle Declaration” Declaration of Justin Bickle, Chief Executive Officer of Nordic Aviation Capital A/S and Chairman of the Restructuring Committee, in Support of the Debtors’ Chapter 11 Petitions and Restructuring Transactions [Docket No. [●]].
3. “First Day Richards Declaration” Declaration of Briana Richards in Support of the Debtors’ Chapter 11 Petitions and First Day Motions [Docket No. [●]].

## II. MOTION TO EXPEDITE

4. “Motion to Expedite First Day Hearing and Approve Form of Commencement” Debtors’ Motion for an Order (I) Setting An Expedited Hearing on “First Day Motions,” (II) Approving the Form of Commencement, and (III) Granting Related Relief [Docket No. [●]].

## III. OPERATIONAL MOTIONS

5. “Cash Management Motion” Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Maintain Existing Business Forms and Books and Records, and (C) Perform Intercompany Transactions and Grant Administrative Expense Status to Intercompany Transactions and (II) Granting Related Relief [Docket No. [●]].
6. “Vendors Motion” Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Foreign Claimants, (B) Lien Claimants, (C) Utility Providers, and (D) Other Claimants, (II) Granting Administrative Expense Priority to All Undisputed Obligations on Account of Outstanding Orders, and (III) Granting Related Relief [Docket No. [●]].
7. “Wages Motion” Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Compensation, and Benefit Obligations and (B) Continue Employee Compensation and Benefits Programs, and (II) Granting Related Relief [Docket No. [●]].
8. “Motion to Seal” Debtors’ Motion for Entry of an Order Authorizing the Debtors to File Exhibits Under Seal in Connection with Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue to Honor Customer Deposits, Reimbursement, and Other Customer Related Obligations in the Ordinary Course of Business, and (II) Granting Related Relief [Docket No. [●]].

9. “Customer Programs Motion” Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue to Honor Customer Deposits, Reimbursement, and Other Customer Related Obligations in the Ordinary Course of Business, and (II) Granting Related Relief [Docket No. [●]].
10. “Insurance Motion” Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Their Prepetition Insurance Coverage and Satisfy Prepetition Obligations Related Thereto, (B) Continue to Pay Certain Brokerage Fees, and (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (II) Granting Related Relief [Docket No. [●]].
11. “Taxes Motion” Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief [Docket No. [●]].

#### IV. ADMINISTRATIVE MOTIONS

12. “Claims and Noticing Agent Retention Application” Debtors’ Application for Entry of an Order (I) Approving the Retention and Appointment of Epiq Corporate Restructuring, LLC as the Claims and Noticing Agent to the Debtors and (II) Granting Related Relief [Docket No. [●]]
  - a. Declaration of Kate Mailloux in Support of the Debtors’ Application for Entry of an Order (I) Approving the Retention and Appointment of Epiq Corporate Restructuring, LLC as the Claims and Noticing Agent to the Debtors and (II) Granting Related Relief [Docket No. [●], Exhibit C].
13. “SOFA, Schedules, and Creditor Matrix Motion” Debtors’ Motion for Entry of an Order (I) Extending Time to File Schedules and Statements of Financial Affairs and Rule 2015.3 Reports, (II) Authorizing the Debtors to File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (III) Authorizing the Debtors to File a Consolidated List of the Debtors’ Thirty Largest Unsecured Creditors, (IV) Authorizing the Debtors to Redact Certain Personal Identification Information, and (V) Granting Related Relief [Docket No. [●]].

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Richmond, Virginia  
Dated: December 20, 2021

*/s/ Jeremy S. Williams*

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*Proposed Co-Counsel to the Debtors and Debtors in Possession*

**Exhibit 2**

**Notice of First Day Hearing**

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*Proposed Co-Counsel to the Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

---

In re:	)	
	)	Chapter 11
	)	
NORDIC AVIATION CAPITAL DESIGNATED	)	Case No. 21-33693 (KRH)
ACTIVITY COMPANY, <i>et al.</i> , <sup>1</sup>	)	
	)	
Debtors.	)	(Joint Administration Requested)
	)	

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**NOTICE OF FILING OF CHAPTER 11 PETITIONS AND  
FIRST DAY MOTIONS AND OF PROPOSED HEARING ON FIRST DAY MOTIONS**

**PLEASE TAKE NOTICE THAT** on December 19, 2021 (the “Petition Date”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “Court”), their respective voluntary petitions for relief under chapter 11 of the United States

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<sup>1</sup> Due to the large number of Debtors in these chapter 11 cases, for which joint administration has been requested, a complete list of the Debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list may be obtained on the website of the Debtors’ proposed claims and noticing agent at <http://dm.epiq11.com/nac>. The location of the Debtors’ service address for the purposes of these chapter 11 cases is: 550 Andrews Avenue, Suite 300, Fort Lauderdale, Florida 33301.



Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”) commencing the above-captioned chapter 11 cases.

**PLEASE TAKE FURTHER NOTICE THAT** together with their chapter 11 petitions, the Debtors also requested an expedited hearing before the Court (the “First Day Hearing”) to consider certain motions and applications filed on the Petition Date and listed on the Proposed First Day Agenda attached hereto (collectively, the “First Day Motions”).

**PLEASE TAKE FURTHER NOTICE THAT** the Court has scheduled the First Day Hearing on **December 21, 2021, at 9:00 a.m., prevailing Eastern Time** in the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, 701 East Broad Street, Richmond, Virginia, 23219. The hearing will be conducted by remote video conference, as directed by the Court. Additional information regarding procedures for hearings before the Court, including remote video hearings, is available by visiting the Court’s website at: <https://www.vaeb.uscourts.gov/>.

**PLEASE TAKE FURTHER NOTICE THAT** a copy of each of the First Day Motions may be viewed on the Court’s website at <http://www.vaeb.uscourts.gov> in accordance with the procedures and fees set forth therein.

**PLEASE TAKE FURTHER NOTICE THAT your rights may be affected.** You should carefully read the First Day Motions and discuss them with your attorney, if you have one in these chapter 11 cases. If you do not have an attorney, then you may wish to consult with one.

**PLEASE TAKE FURTHER NOTICE THAT** if you do not want the Court to grant the relief requested in the First Day Motions, or if you want the Court to consider your views on the First Day Motions, then you or your attorney must attend the First Day Hearing. If you or your

attorney do not take these steps, then the Court may decide that you do not oppose the relief sought in the First Day Motions and may enter orders granting the relief requested in the First Day Motions.

*[Remainder of page intentionally left blank]*

Richmond, Virginia  
Dated: December 20, 2021

/s/ Jeremy S. Williams

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*Proposed Co-Counsel to the Debtors and Debtors in Possession*

**Exhibit 3**

**Notice of Commencement**

**Information to identify the case:**

**Debtor: NORDIC AVIATION CAPITAL DESIGNATED ACTIVITY COMPANY**

**EIN: IE3410995SH**

**United States Bankruptcy Court for the Eastern District of Virginia**

**Case Number: 21-33693**

**Official Form 309F (For Corporations or Partnerships)**

**Notice of Chapter 11 Bankruptcy Case**

**12/15**

For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered. This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at [www.pacer.gov](http://www.pacer.gov)).

**The staff of the bankruptcy clerk's office cannot give legal advice.**

**Do not file this notice with any proof of claim or other filing in the case.**

**1. Debtor's full name: See Chart Below**

**2. All other names used in the last 8 years: Not Applicable**

DEBTOR	ADDRESS	CASE NO.	EIN #
Nordic Aviation Capital Pte. Ltd.	20 Bendemeer Road, #03-12 Singapore, 339914	21-33688	200908209H
Nordic Aviation Capital Designated Activity Company	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33693	IE3410995SH
ALC ATR 426 1012, LLC	c/o Paracorp Incorporated 2140 South Dupont Highway Camden, DE 19934	21-33696	37-1789781
ALC ATR 426 1018 LLC	c/o Paracorp Incorporated 2140 South Dupont Highway Camden, DE 19934	21-33697	32-0464740
ALC ATR 726 1086, LLC	c/o Paracorp Incorporated 2140 South Dupont Highway Camden, DE 19934	21-33698	90-0871076
ALC ATR 726 1103, LLC	c/o Paracorp Incorporated 2140 South Dupont Highway Camden, DE 19934	21-33695	90-0923740
ALC ATR 726 1112, LLC	c/o Paracorp Incorporated 2140 South Dupont Highway Camden, DE 19934	21-33701	61-1701846
Aldus Portfolio B Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33705	IE3313708UH

DEBTOR	ADDRESS	CASE NO.	EIN #
Aldus Portfolio Leasing Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33708	IE9676429S
Argos Aviation Malta Limited	85, St. John Street, Valletta VLT 1165	21-33712	997 003 710
Eagle I Limited	Maples Corporate Services Ltd, PO Box 309 Ugland House, KY-1104 Grand Cayman	21-33716	N/A
Enclave Aviation Sweden AB	Trädgårdsvägen 34, SE 237 35 Bjärred, Sweden	21-33719	SE559030873901
Fortuna Aviation Designated Activity Company	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33720	IE9822690Q
Fortuna Aviation Holding Limited	Trinity Chambers P.O. Box 4301 Road Town, Tortola, British Virgin Islands	21-33700	N/A
Freyja Aviation Four Ireland Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33714	IE 3356409DH
Freyja Aviation One Ireland Designated Activity Company	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33718	997 431 806
Freyja Aviation One Malta Limited	85, St. John Street, Valletta VLT 1165	21-33703	IE3415373JH
Freyja Aviation Three Ireland Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33717	IE3411568EH
Freyja Aviation Two Ireland Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33721	IE 3410097JH
JAG VIII LLC	401 East Las Olas Boulevard, Suite 1700 Fort Lauderdale, Florida 33301, United States of America"	21-33710	26-3899712
Jetscape Aviation Group, LLC	401 East Las Olas Boulevard, Suite 1700 Fort Lauderdale, Florida 33301, United States of America"	21-33706	56-2346674
Jetscape Aviation Group Ltd.	Trinity Chambers P.O. Box 4301 Road Town, Tortola, British Virgin Islands	21-33704	3281961LH
Jetscape Commercial Jets Limited	Trinity Chambers P.O. Box 4301 Road Town, Tortola, British Virgin Islands	21-33707	N/A
Jetscape, Inc.	c/o National Registered Agents, Inc. 160 Greentree Drive, Suite 101 Dover, Delaware 19904	21-33709	47-3104246

DEBTOR	ADDRESS	CASE NO.	EIN #
Magni Aviation One Sweden AB	Trädgårdsvägen 34, SE 237 35 Bjärred, Sweden	21-33711	SE559022723601
Merlano Limited	Esperidon 12, 4th Floor, P.C. 1087, Nicosia, Cyprus	21-33713	CY10278587K
Minerva Aviation Malta Limited	85, St. John Street, Valletta VLT 1165	21-33715	997 003 809
NAC Aviation 10 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33699	IE3196854LH
NAC Aviation 11 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33702	IE3221833MH
NAC Aviation 12 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33743	IE 3284218UH
NAC Aviation 14 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33745	IE3287775VH
NAC Aviation 15 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33748	IE3287777CH
NAC Aviation 16 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33725	IE3287778EH
NAC Aviation 17 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33689	IE3289043NH
NAC Aviation 18 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33731	IE3289045RH
NAC Aviation 19 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33735	IE3289046TH
NAC Aviation 2 A/S	Stratusvej 12 7190 Billund, Denmark	21-33694	DK 35487190
NAC Aviation 2 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33722	IE9703594G
NAC Aviation 20 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33690	IE3319434QH
NAC Aviation 21 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33737	IE 3319437WH

DEBTOR	ADDRESS	CASE NO.	EIN #
NAC Aviation 22 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33742	IE 3319439DH
NAC Aviation 23 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33744	IE3334917AH
NAC Aviation 24 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33746	IE3347915RH
NAC Aviation 25 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33747	IE3422324KH
NAC Aviation 26 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33749	IE3422330FH
NAC Aviation 27 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33724	IE 3445878LH
NAC Aviation 28 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33726	IE3458911EH
NAC Aviation 29 Designated Activity Company	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33727	IE3460269TH
NAC Aviation 3 A/S	Stratusvej 12 7190 Billund, Denmark	21-33723	DK 25587774
NAC Aviation 3 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33728	IE9730667K
NAC Aviation 30 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33729	IE3466753IH
NAC Aviation 31 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33730	IE3466718GH
NAC Aviation 32 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33732	IE3539989SH
NAC Aviation 33 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33734	IE 3539984IH
NAC Aviation 34 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33739	IE 3662766LH



DEBTOR	ADDRESS	CASE NO.	EIN #
NAC Aviation 35 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33740	IE 3677468LH
NAC Aviation 36 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33741	IE3690332JH
NAC Aviation 4 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33733	IE9758109F
NAC Aviation 6 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33736	IE9758438B
NAC Aviation 7 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33738	IE9766564C
NAC Aviation 8 Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33778	IE9766569M
NAC Aviation Canada Inc.	2680 Skymark Avenue Suite 415 L4W 5L6 Mississauga Ontario, Canada	21-33752	82327 9336 RP0001
NAC Aviation Colorado 1 LLC	c/o CT Corporation 1675 Broadway, Suite 1200 Denver, CO 80202	21-33755	45-3142315
NAC Aviation Colorado 2 LLC	c/o CT Corporation 1675 Broadway, Suite 1200 Denver, CO 80202	21-33761	45-3142363
NAC Aviation Cyprus 1 Limited	Esperidon 12, 4th Floor, P.C. 1087, Nicosia, Cyprus	21-33764	CY10277694I
NAC Aviation Cyprus 2 Limited	Esperidon 12, 4th Floor, P.C. 1087, Nicosia, Cyprus	21-33768	CY10239854C
NAC Aviation Cyprus 3 Limited	Esperidon 12, 4th Floor, P.C. 1087, Nicosia, Cyprus	21-33771	CY10359247Z
NAC Aviation France 1 SAS	18 Rue Pasquier 75008 Paris	21-33773	FR727520 42184
NAC Aviation France 5 SAS	18 Rue Pasquier 75008 Paris	21-33751	FR207984 17317
NAC Aviation France 6 SAS	18 Rue Pasquier 75008 Paris	21-33762	FR587984 17168
NAC Aviation France 7 SAS	18 Rue Pasquier 75008 Paris	21-33766	FR 31 829163831
NAC Aviation UK 1 Limited	Tricor Suite, 4th Floor 50 Mark Lane, London United Kingdom, EC3R 7QR	21-33759	507 19623 00606
NAC Aviation UK 2 Limited	Tricor Suite, 4th Floor 50 Mark Lane, London United Kingdom, EC3R 7QR	21-33775	623 33849 15390
NAC Aviation UK 3 Limited	Tricor Suite, 4th Floor 50 Mark Lane, London United Kingdom, EC3R 7QR	21-33774	623 65874 25368

DEBTOR	ADDRESS	CASE NO.	EIN #
NAC Aviation US LLC	401 East Las Olas Boulevard, Suite 1700 Fort Lauderdale, Florida 33301, United States of America"	21-33772	81-4231841
NAC Services China Co., Ltd.	Unit 34, Office 2T01, Level 9, 79 Jianguo Road, Chaoyang District, Beijing, China	21-33770	91110105MA01H FC32Y
NAC Services France SAS	18 Rue Pasquier 75008 Paris	21-33756	FR297984 20618
NAC Services Malta Limited	85, St. John Street, Valletta VLT 1165	21-33750	995 907 303
NAC Services UK Limited	Tricor Suite, 4th Floor 50 Mark Lane, London United Kingdom, EC3R 7QR	21-33753	507 37052 05436
NK Aviation Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33754	IE 9697104H
NK Leasing Limited	5th Floor, Bedford Place, Henry Street, Limerick	21-33776	IE9732017E
Nordic Aviation Capital A/S	Stratusvej 12 7190 Billund, Denmark	21-33691	65-1057490
Nordic Aviation Capital Inc.	401 East Las Olas Boulevard, Suite 1700 Fort Lauderdale, Florida 33301, United States of America"	21-33757	65-1057490
Nordic Aviation Contractor (Ireland) Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33758	IE6423689H
Nordic Aviation Financing ApS	Stratusvej 12 7190 Billund, Denmark	21-33760	201215685N
Nordic Aviation Financing One Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33763	DK 21167401
Nordic Aviation Leasing Eight Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33765	201303338M
Nordic Aviation Leasing Eighteen Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33767	201604192C
Nordic Aviation Leasing Eleven Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33769	201313914H
Nordic Aviation Leasing Fifteen Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33792	201437295E
Nordic Aviation Leasing Fourteen Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33795	201318661W
Nordic Aviation Leasing Nine Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33798	201303343K
Nordic Aviation Leasing Nineteen Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33800	201604197R
Nordic Aviation Leasing Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33801	201135641M
Nordic Aviation Leasing Seven Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33802	201226894Z
Nordic Aviation Leasing Seventeen Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33803	201523019W
Nordic Aviation Leasing Six Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33804	201215448G
Nordic Aviation Leasing Sixteen Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33805	201501573M

DEBTOR	ADDRESS	CASE NO.	EIN #
Nordic Aviation Leasing Twelve Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33799	201318655H
Nordic Aviation Leasing Twenty Eight Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33788	201814642R
Nordic Aviation Leasing Twenty Five Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33793	201728811R
Nordic Aviation Leasing Twenty Four Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33791	201703551E
Nordic Aviation Leasing Twenty Nine Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33797	201814645H
Nordic Aviation Leasing Twenty One Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33785	201614705E
Nordic Aviation Leasing Twenty Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33790	201614699H
Nordic Aviation Leasing Twenty Seven Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33794	201814634E
Nordic Aviation Leasing Twenty Three Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33796	201703548H
Nordic Aviation Leasing Twenty Two Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33777	201616591Z
Nordic Aviation Leasing Two Pte. Ltd.	20 Bendemeer Road, #03-12, Singapore, 339914	21-33779	201201906D
Nordic Aviation Services Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33780	IE9697093F
Nordic Aviation Services US, LLC	c/o The Corporation Trust Company 1209 Orange Street County of New Castle Wilmington, DE 19801	21-33781	N/A
Tiradentes Portfolio A Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33782	IE9799230G
Tiradentes Portfolio B Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33783	IE9799255W
Tiradentes Portfolio C Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33784	IE9821200O
Tiradentes Portfolio D Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33786	IE9831628M
Tyche Aviation Designated Activity Company	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33787	IE9822684V
Tyche Aviation Holding Limited	Gardens International Henry Street Limerick City, Ireland V94 4D83	21-33789	N/A

**3. Address: See Chart Above**

**4. Debtor's attorney**

Edward O. Sassower, P.C. (*pro hac vice* pending)  
Emily Geier (*pro hac vice* pending)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
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Michael A. Condyles (VA 27807)  
Peter J. Barrett (VA 46179)  
Jeremy S. Williams (VA 77469)  
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Richmond, Virginia 23219-4071  
Telephone: (804) 644-1700  
Facsimile: (804) 783-6192

Chad J. Husnick, P.C. (*pro hac vice* pending)  
David R. Seligman, P.C. (*pro hac vice* pending)  
Jaimie Fedell (*pro hac vice* pending)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
300 North LaSalle Street  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200

*Proposed Co-Counsel to the Debtors and Debtors in Possession*

**5. Bankruptcy clerk's office**

Documents in this case may be filed at this address.

You may inspect all records filed in this case at this office or online at [www.pacer.gov](http://www.pacer.gov).

**U.S. Bankruptcy Court**  
**701 East Broad Street,**  
**Suite 4000**  
**Richmond, Virginia 23219**

**Hours open:**  
**Monday – Friday**  
**9:00 AM – 4:00 PM ET**  
**Contact phone 804-916-2400**

**6. Meeting of creditors (if any)**

The debtor's representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so.

**Time and Date To be Determined**  
The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.

**Location:**

**7. Proof of claim deadline**

**Deadline for filing proof of claim: [Not yet set. If a deadline is set, notice will be sent at a later time].**

A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at [www.uscourts.gov](http://www.uscourts.gov) or any bankruptcy clerk's office.

Your claim will be allowed in the amount scheduled unless:

- ☐ Your claim is designated as *disputed*, *contingent*, or *unliquidated*;
- ☐ You file a proof of claim in a different amount; or
- ☐ You receive another notice

If your claim is not scheduled or if your claim is designated as *disputed*, *contingent*, or *unliquidated*, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.

You may review the schedules at the bankruptcy clerk's office or online at [www.pacer.gov](http://www.pacer.gov).

Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.

#### **8. Exception to discharge deadline**

The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.

You must start a judicial proceeding by filing a complaint if you want to have a debt excepted from discharge under 11 U.S.C. § 1141(d)(6)(A).

**Deadline for filing the complaint: To be Determined**

#### **9. Creditors with a foreign address**

If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.

#### **10. Filing a Chapter 11 bankruptcy case**

Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate its business.

#### **11. Discharge of debts**

Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that creditors may never try to collect the debt from the debtor except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge under 11 U.S.C. § 1141(d)(6)(A), you must start a judicial proceeding by filing a complaint and paying the filing fee in the bankruptcy clerk's office by the deadline.